

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA,	:	
	:	
Plaintiff,	:	
	:	
v.	:	Criminal Action No. 07-51-GMS
	:	
ROBERT ESCOBAR-SOLANO,	:	
	:	
Defendant.	:	

**MOTION FOR CONTINUANCE OF SCHEDULING CONFERENCE**

The defendant, Robert Escobar-Solano, through undersigned counsel Eleni Kousoulis, hereby moves this Honorable Court for an Order continuing the scheduling conference in this case. In support of this motion, the defense submits as follows:

1. A scheduling conference in this matter is currently scheduled for September 17, 2007 at 11:30 .am.
2. Defense counsel will be out of the office attending a conference from September 16, 2007 through September 19, 2007, and not returning to the office until September 20, 2007. Therefore, defense counsel will be unavailable on September 17, 2007, the date that Mr. Escobar-Solano's scheduling conference is currently scheduled.
3. Defense counsel respectfully requests that Mr. Escobar-Solano's scheduling conference be continued.
4. AUSA Edmond Falgowski, the attorney handling this case for the government, has no objection to the defense's continuance request.

5. The defense agrees to waive the time from September 17, 2007, until the date of the continuance for purposes of the Speedy Trial Act (18 U.S.C. § 3161, et seq.).

**WHEREFORE**, for these reasons and any other such reasons that shall appear to the Court, the defense respectfully requests a continuance of scheduling conference in this case.

Respectfully submitted,

/s/

Eleni Kousoulis, Esquire  
Assistant Federal Public Defender  
704 King Street, Suite 110  
Wilmington, DE 19801  
Counsel for Defendant Escobar-Solano

Dated: September 6, 2007

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	:	
Defendant.	:	

**ORDER**

The Court having considered the Defendant's Motion for Continuance of Scheduling Conference, good cause having been shown therefore;

IT IS HEREBY ORDERED this \_\_\_\_\_ day of \_\_\_\_\_, 2007 that the defendant's motion is hereby granted, and the scheduling conference in this case is rescheduled for the \_\_\_\_\_ day of \_\_\_\_\_, 2007, and that the time from September 17, 2007 up to the day of the scheduling conference shall be excluded under the Speedy Trial Act (18 U.S.C. § 3161, et seq.).

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Honorable Gregory M. Sleet  
United States District Court